

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MINTON, *et al.*
Plaintiffs,

v.

INTERCONTINENTAL TERMINALS
COMPANY LLC, *et al.*,
Defendants.

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C.A. No. 4:21-cv-00143

AGREED MOTION TO DISMISS WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41, Plaintiffs Jason (James) Minton; Ahmad N. Ali Odet-Allah; Leonel Andres Barreto; Justin Braly; Marvin Calderon; Frieda Guadalupe Cavazos; Faridah Davis; Jean Carlo DeLeon; Mark A. Hubert; Wynn Jones; Adrian Landry; Elizabeth Vieceas Lizama; Francisco Macias; Marcia Geneva Mitchell; Rudolph Monclova; Detrik Lenard Louis Montgomery; Cristian Moreno; Eleazar Perez; Shannon Peterson-Young; Tatiana Ramirez; Toni Richardson; Michael Stidham; and Manuela Torres (collectively, the “Minton Plaintiffs”) and Defendant Intercontinental Terminals Company LLC (“ITC”) respectfully move the Court to enter an Agreed Order of Dismissal with Prejudice, ordering that the Minton Plaintiffs’ claims against ITC be dismissed with prejudice.¹

The Minton Plaintiffs and ITC respectfully request that the Court dismiss with prejudice all of the Minton Plaintiffs’ claims against ITC because all matters in controversy between the Minton Plaintiffs and ITC have been resolved, and there is no

¹ The claims against all other parties previously named as defendants have been dismissed through prior orders of the Court or agreement of the parties.

further need or occasion for the prosecution of the Minton Plaintiffs' claims against ITC. The Minton Plaintiffs and ITC further agree that taxable costs are to be borne by the party incurring same.

In accordance with the Court's Order Establishing Common Benefit Fund (DE 1117), all amounts owed for Common Benefit Attorneys' Fees, General Expenses, and/or Liability-Related Common Benefit Expenses in connection with the resolution of these claims have been paid or will be paid pursuant to the Confidential Master Settlement Agreement, dated March 7, 2024, governing the resolution of these claims.

Dated: January 16, 2025

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I certify that on January 16, 2025, a copy of this document has been served on all counsel of record in the above-captioned cases by electronic service.

/s/ Russell C. Lewis

Russell C. Lewis